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Attorneys for Plaintiff and Others Similarly Situated

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JOHN CASTORINA, individually and
on behalf of all others similarly situated,

Plaintiff,

vs.

BANK OF AMERICA, N.A., and
INTEGON NATIONAL INSURANCE
COMPANY,

Defendants.

Case No.: 2:21-CV-02004-WBS-KJN

**STIPULATION FOR STAY
OF LITIGATION**

HON. WILLIAM B. SHUBB

1 Plaintiff John Castorina (“Plaintiff”) and Defendant Bank of America, N.A.
2 (“Defendant”) (collectively, the “Parties”), by their undersigned counsel, hereby stipulate and
3 agree as follows:
4

5 On October 29, 2021, Plaintiff John Castorina filed his Complaint [ECF No. 1].

6 On January 12, 2022, Defendant Bank of America, N.A. filed a Motion to Dismiss [ECF
7 No. 15-1].
8

9 On March 7, 2022, Defendant Integon National Insurance Company filed a Motion to
10 Dismiss [ECF No. 20].
11

12 On March 21, 2022, Plaintiff John Castorina filed two memorandums in opposition to
13 Defendants’ Motions to Dismiss [ECF Nos. 21, 22].
14

15 On April 11, 2022, Defendants Bank of America, N.A. and Integon National Insurance
16 Company filed separate memoranda in support of their respective Motions to Dismiss [ECF
17 Nos. 23, 24].
18

19 On May 6, 2022, this Court issued a Memorandum and Order Granting, in part, and
20 Denying, in part, Defendants’ Motions to Dismiss, and allowing Plaintiff twenty (20) days to
21 file a second amended complaint [ECF No. 27].
22

23 On May 24, 2022, Plaintiff John Castorina and Defendant Bank of America, N.A.
24 stipulated and agreed to a 21-day extension for Plaintiff to investigate factual issues raised by
25 Defendant, and, if applicable, file the Amended Complaint by June 15, 2022 [ECF No. 29].
26

27 On June 14, 2022, Plaintiff’s counsel has learned that Plaintiff has undergone a
28 significant unforeseen medical emergency and is presently unable to communicate with counsel.

1 On June 14, 2022, the Parties conferred and agreed to a sixty (60) day stay of all
2 deadlines.

3 On August 10, 2022, the Parties conferred and agreed to an additional thirty (30) day stay
4 of all deadlines in light of Mr. Castorina's continuing medical recovery.
5

6 The Parties agree that this temporary stay will not prejudice either Party.


7 Now, therefore, the Parties respectfully request that the Court enter an Order reflecting
8 the stay set forth in this Stipulation.
9

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15 **ORDER**

16 **IT IS SO ORDERED:**

17 All deadlines in this pending litigation are hereby stayed for sixty (60) days. The
18 Scheduling Conference is continued from September 26, 2022 to **December 5, 2022 at**
19 **1:30 p.m.** A joint status report shall be filed no later than **November 21, 2022.**
20

21
22 Dated: August 11, 2022


23 WILLIAM B. SHUBB
24 UNITED STATES DISTRICT JUDGE
25
26
27
28

1 Respectfully submitted,

2 Dated: August 11, 2022

s/David A. Goodwin

Daniel E. Gustafson (#202241)

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Attorneys for Plaintiff

John Castorina

1 Dated: August 11, 2022

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*Attorneys for Defendant
Bank of America, N.A.*

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17 **CERTIFICATE OF SERVICE**

18 I HEREBY CERTIFY that a true and correct copy of the foregoing was electronically
19 filed on August 11, 2022, with Clerk of the Court using CM/ECF which caused a copy to be
20 served on all counsel of record.
21
22

23
24 Dated: August 11, 2022

By: /s/David A. Goodwin
David A. Goodwin